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By ECF

Honorable Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Ins. Company, et al. v. Northern Medical Care, P.C., et al.*
Case No. 1:20-cv-01214-RRM-LB

Dear Judge Bloom:

We represent Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively "Plaintiffs") in the above-referenced matter. Along with Defendants Northern Medical Care, P.C., Omar Ahmed, M.D., Restoralign Chiropractic, P.C., David Krasner, D.C., Wei Dao Acupuncture, P.C., Boruch Laosan, Inc., and Igor Mayzenberg, L.Ac. (collectively, the "Defendants", and together with Plaintiffs, the "Parties") the Parties write to jointly and respectfully request an extension of the remaining discovery deadlines in this case.

In particular, the Parties request that:

- (i) the deadline to complete fact discovery be extended from July 30, 2021 to November 1, 2021;
- (ii) the deadline for service of Plaintiffs' expert reports be extended from September 30, 2021 to January 7, 2022;
- (iii) the deadline for service of Defendants' expert reports be extended from November 1, 2021 to February 4, 2022; and
- (iv) the deadline to complete expert discovery be extended from December 1, 2021 to March 4, 2022.

There is good cause for the extension of these deadlines. As the Court may recall, although the Parties continue to work through discovery, there have been delays in that process (*see* ECF Nos. 47-48) that have hindered the progression of discovery. Moreover, Plaintiffs have issued a number of non-party subpoenas for both depositions and documents that have gone unanswered. Plaintiffs are in the process of preparing an application to this Court seeking orders compelling various of these non-parties' compliance. Further, given the complexity of the evidence at issue, Plaintiffs continue to review the financial discovery obtained in this case, and will need additional time to seek supplemental financial records based on their findings. Finally, while document discovery is progressing, the Parties have not

yet commenced taking depositions, and will need additional time to prepare and conduct them in the coming months. At bottom, the requested extensions will permit the Parties to continue to progress through discovery and properly prepare this matter for dispositive motion practice and, if necessary, trial.

As such, the Parties jointly and respectfully request the above-outlined extensions. This is the first request for an extension of the pertinent deadlines in this case. We thank the Court for its time and attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

A handwritten signature in black ink, appearing to read 'S. Henesy', with a stylized flourish extending to the right.

Steven T. Henesy

Cc: All counsel of record (via ECF)